

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW  
40 EXCHANGE PLACE  
18TH FLOOR  
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE  
(212) 482-1303 FAX  
WWW.TALKINLAW.COM  
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLICOTT CITY, MD 21042  
410-964-0300

NEW JERSEY OFFICE  
2500 PLAZA 5  
HARBORSIDE FINANCIAL CENTER  
JERSEY CITY, NJ 07311  
201-342-8665

MEMO ENDORSED

May 25, 2021

5/25/21

Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Bail modification as requested  
is granted.

*Colleen McMahon*

BY ECF

Re: United States v. James Cahill  
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully makes two bail modification applications. On Friday, May 28, 2021, Cahill requests permission to travel to his house in Long Beach, New York, from 9 am to 7 pm so that he can open the home up and prepare it for the summer season. The exact address of the home is known to Pretrial Services ("PTS") and the government. Additionally, from July 1, 2021 through Labor Day weekend, Cahill requests that he be permitted to live at his home in Long Beach. PTS, by United States Pretrial Service Officer Andrew Abbott, consents to these applications and will coordinate with the Eastern District of New York PTS to transfer supervision while defendant lives in Long Beach. The government, by Assistant United States Attorney Jason Swergold, agrees with PTS' position on these applications.

Thank you for Your Honor's consideration of these requests.

Very truly yours,

*Sanford Talkin*  
Sanford Talkin

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